

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

CIGNA CORPORATION,

Plaintiff,

v.

No. 4:23-cv-00093-RLW

AMY BRICKER and CVS PHARMACY,  
INC.,

Defendants.

**DEFENDANT AMY BRICKER’S RULE 12(b)(6)  
MOTION TO DISMISS PLAINTIFF’S THIRD AMENDED COMPLAINT**

Defendant Amy Bricker (“Ms. Bricker”) moves this Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss Plaintiff Cigna Corporation’s Third Amended Complaint. ECF No. 50. Specifically, Ms. Bricker moves this Court to dismiss Counts I (Breach of Contract), II (Misappropriation of Trade Secrets in violation of the Missouri Uniform Trade Secrets Act), III (Misappropriation of Trade Secrets in violation of the Defend Trade Secrets Act), V (Violation of the Computer Fraud and Abuse Act), VI (Common Law Unfair Competition), VII (Unjust Enrichment), and VIII (Conversion) for the reasons set forth in the accompanying Memorandum of Law in Support of Ms. Bricker’s Rule 12(b)(6) Motion to Dismiss Plaintiff’s Third Amended Complaint and supporting documents.

WHEREFORE, Defendant Amy Bricker respectfully requests that this Court grant the instant motion for the reasons stated in the accompanying Memorandum and dismiss Counts I, II, III, V, VI, VII and VIII of Plaintiff’s Third Amended Complaint and for any such other and further relief as this Court deems just and proper.

Dated: May 1, 2023

Respectfully submitted,

*Counsel for Ms. Bricker*  
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By: /s/ William Ray Price, Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 1, 2023 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system.

/s/ William Ray Price, Jr.